

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

FTX TRADING LTD., *et al.*,

Case No. 22-11068 (JTD)

Debtors.

(Jointly Administered)

---

FTX TRADING LTD. and MACLAURIN  
INVESTMENTS LTD.,

Plaintiffs,

Adv. Pro. No. 23-50437 (JTD)

-against-

LOREM IPSUM UG, PATRICK GRUHN,  
ROBIN MATZKE, and BRANDON  
WILLIAMS,

Defendants.

---

**MOTION FOR PROTECTIVE ORDER**

Defendant, Brandon Williams, moves under Fed. R. Civ. P. 26(c), as made applicable by Fed. R. Bankr. P. 7026, and for a protective order staying all discovery until the Court has ruled on the motions to dismiss for lack of subject matter jurisdiction filed by all Defendants in this adversary proceeding [D.I. 31, 34] and in the bankruptcy cases. [Adv. Pro. No., 22-11068, D.I. 3399, 3400]. The grounds for this motion are set forth and discussed in the accompanying Brief. The accompanying Appendix contains exhibits in support of this motion. A certificate of compliance with Fed. R. Civ. P. 26(c)(1), as made applicable by Fed. R. Bankr. P. 7026, and Local Rule 7026-1(d) accompanies this motion. Defendant, Brandon Williams understands that the other

Defendants in this Adversary Proceeding may join in this motion and may also request a stay of discovery.

To preserve his right to a jury trial in the event his motion is not granted, Brandon Williams does not consent to the Bankruptcy Court entering final judgment but reserves the right to do so at a later date.

/s/ Gregory L. Arbogast  
Lawrence J. Gebhardt (*pro hac vice pending*)  
Gregory L. Arbogast (No. 6255)  
GEBHARDT & SMITH LLP  
1000 N. West Street, Suite 1200  
Wilmington, DE 19801  
T: (302) 295-5038  
F: (443) 957-4325  
Garbogast@gebsmith.com

*Attorneys for Defendant,  
Brandon Williams*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of November, 2023, copies of the Motion for Protective Order, Brief were electronically filed with the Clerk of the Bankruptcy Court for the District of Delaware using the CM/ECF system. Notice of these filings will be sent to all parties authorized to receive electronic notice in this case.

/s/ Gregory L. Arbogast  
Gregory L. Arbogast